

REMARKS

1. Claims 1-6 and 10-13 are pending in the present application.
2. In the Action, the Examiner rejects claims 1 and 5 under 35 USC 103(a) as being obvious over U.S. Pat. No. 6,421,711 to Blumenau in view of U.S. Pat. No. 5,872,968 to Knox and further in view of U.S. Pat. No. 5,659,801 to Kopsaftis. The Applicants respectfully disagree.

Claim 1 recites "*a transforming device . . . receiv[ing] a hard disk access command from [a] diskless client and pack[ing] the hard disk access command and an identity number relative to the diskless client into a package.*" The Examiner acknowledges that Blumenau does not disclose such feature. According to the Examiner, such feature is disclosed in Knox, at column 4, lines 9-17 and 30-43. In particular, the Examiner is of the opinion that Knox implicitly teaches receiving an access command and packing it with an identifier into a packet. The Applicants respectfully disagree.

As already explained by Applicants in the previous response filed on July 15, 2005, lines 9-17 and 30-43 at column 4 of Knox disclose network protocols for communications between computers. In particular, Knox discloses a bootrequest command in the BOOTP protocol (column 4, lines 30-43) or an RPL request code in the RPL protocol (column 4, lines 9-17). Where is a "*hard disk access command*" disclosed in Knox? Further, the Examiner also alleges that Knox implicitly teaches receiving an access command and packing it

with an identifier into a packet. The Examiner is respectfully reminded that the standard for implicit disclosure, relates to something which is present in a disclosure instead of something that could be present. Even assuming, arguendo, that Knox teaches sending both a hard disk access command and an identifier, where is it stated that the command and the identifier are packed in the same package or packet? With all due respect, the Examiner is using the language of Applicants' claim 1 as a roadmap instead of finding the recited features in Knox. Clarification is respectfully requested.

Claim 1 also recites that *"the hard disk access command complies with a peripheral interface standard allowing connection of a peripheral device to a PC"*. The Examiner acknowledges that neither Blumenau nor Knox disclose such feature, thus agreeing with the Applicants' remarks in the response filed by Applicants on July 15, 2005. However, according to the Examiner, such feature is disclosed in Kopsaftis, at column 2 lines 4-47, column 4 line 3 through column 5 lines 62, and Figure 2 of Kopsaftis. The Applicants respectfully disagree.

In particular, the Applicants disagree with the Examiner's contention that Kopsaftis discloses packing the hard disk access command and the identity number relative to the diskless client (read as client's address) into a packet. In the following paragraphs, the Applicants will show not only that such feature is not disclosed in Kopsaftis, but also that Kopsaftis teaches against it.

Kopsaftis discloses a plurality of user terminals 32 coupled to a system bus 50 through a user interface 30, in order to access a disk drive 10. A host processor 20 executes programs for accessing the disk drive 10 via an SCSI interface adapter 40. Two different buses 50, 60 are shown. System bus 50 couples the host processor 20 to the user interface 30 and SCSI adapter 40. SCSI bus 60 couples the SCSI interface 40 to the disk drive 10. While bus 60 operates in accordance with a peripheral interface standard (SCSI), the command packet sent on bus 60 relates to the device to be accessed (i.e. the hard disk 10), as disclosed at column 5, lines 4-22 of Kopsaftis. See, in particular, column 5 lines 7-10 which mention data to indicate which device (i.e. the hard disk 10) on the SCSI bus 60 is to respond to the command. In other words, Kopsaftis neither discloses nor is concerned with packing "*an identity number relative to the diskless client*" into a package with the hard disk access command. Therefore, the Applicants have not been able to find reference to the "client's address", as stated by the Examiner. Should the Examiner disagree, additional clarification is respectfully requested.

In addition to the above, the Applicants submit that the person skilled in the art would not be motivated to combine Knox with Kopsaftis. Knox is concerned with a boot process, i.e. use of an operative system program. On the other hand, Kopsaftis is concerned with use of an application program.

Therefore, the Applicants submit that claim 1 is patentable over a combination of Blumenau, Knox and Kopsaftis, together with claim 5, at least by virtue of its dependency on claim 1.

3. In the Action, the Examiner rejects claims 2-4 and 6 under 35 USC 103(a) as being obvious over Blumenau, in view of Knox, further in view of Kopsaftis, and further in view of U.S. Pat. No. 6,477,624 to Kedem. The Applicants respectfully disagree. Claims 2-4 and 6 depend on claim 1. The Applicants have already shown that claim 1 is patentable over Blumenau, Knox and Kopsaftis. As to Kedem, the Examiner has only shown to Applicants where features specific to claims 2-4 and 6 are allegedly disclosed, without addressing the features according to which claim 1 is patentable over Blumenau, Knox and Kopsaftis. Therefore, the Examiner has not made a prima facie 35 USC 103(a) case against claims 2-4 and 6.

4. In the Action, the Examiner rejects claims 10-13 under 35 USC 103(a) as being obvious over Kedem in view of Kopsaftis. The Applicants respectfully disagree.

Claim 10 recites "[a] logical circuit . . . to receive [a] hard disk access command and pack both the hard disk access command and an identity number unique to the diskless client into a package." In the Action, the Examiner acknowledges that such feature is not taught in Kedem. According to the Examiner, such feature is disclosed in Kopsaftis. However, the Applicants have already discussed above, in detail, that Kopsaftis is concerned with commands related to the device to be addressed, not to a diskless client.

Therefore, claim 10 is patentable over the cited art, together with claims 11-13, at least by virtue of their dependency on claim 10.

The Commissioner is authorized to charge any additional fees, which may be required or credit overpayment to deposit account no. 12-0415. In particular, if this response is not timely filed, then the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136 (a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

I hereby certify that this correspondence is being deposited with the United States Post Office with sufficient postage as first class mail in an envelope addresses to Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

October 31, 2005
(Date of Deposit)

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10/31/05
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